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10 UNITED STATES DISTRICT COURT
11 FOR THE EASTERN DISTRICT OF WASHINGTON

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 RONALD CRAIG ILG,

16 Defendant.

Case No. 2:21-CR-0049-WFN-1

United States' Opposition to
Defendant's Motion to Continue
Sentencing

17 The United States of America, by and through United States Attorney Vanessa
18 R. Waldref and Assistant United States Attorneys Richard R. Barker and Patrick J.
19 Cashman, submits this response to Defendant's motion to continue sentencing. As
20 noted in Defendant's motion, the United States reserved its position on the requested
21 countenance pending consultation with the victims. The United States has now spoken
22 with the victims and opposes the continuance.

23 On January 17, 2023, the United States reached out to Defendant's now ex-wife
24 (Victim 2 in the Superseding Indictment), who is the person Defendant arranged to
25 have kidnapped by a dark web hitman in April 2020. Victim 2 strongly opposes any
26 further continuance in this case. In this regard, a close family member of Victim 2
27 arranged travel from out of state to be present at sentencing and support Victim 2.
28 This same family member had to rearrange travel and scheduling when the original

1 November sentencing date was continued, and the family member may suffer
2 additional financial and scheduling difficulties if the sentencing were continued again.
3 Victim 2's counselor has also rearranged her busy work schedule to be with Victim 2
4 at sentencing. As Victim 2 put it in an email to the United States, "I've been anxious
5 for months to get this over with, and I'm tired of continuing it on. I'm not only dealing
6 with this, but also dealing with the motions [Defendant] files in family court. I just
7 want some peace."

8 In light of Victim 2's comments, the United States submits that sentencing
9 should go forward as scheduled on January 24, 2023 at 10:00 a.m. This case has been
10 pending for nearly two years, and the change of plea took place on August 10, 2022 –
11 more than five months ago. There already has been one continuance to the sentencing
12 date. And, while the United States is sensitive to Mr. Wagley's trial schedule, the
13 United States believes that Defendant's sentencing arguments can be summarized in
14 a responsive brief by Defendant's lead counsel, who has demonstrated his capacity
15 for strong written and oral advocacy.

16 In addition, while the Defense notes the length and substance of the United
17 States' sentencing memorandum as a basis for a continuance, the government submits
18 that our sentencing position is based on the PSIR along with some additional materials
19 with which Defendant is well familiar. In fact, much of these materials were cited in
20 the United States 404(b) notice and flagged elsewhere in discovery. While the United
21 States did attach a small number of audio files, these materials were noticed in
22 discovery and at prior detention hearings. In fact, certain of the audio – including jail
23 calls in which Defendant discussed a book deal and financial opportunities stemming
24 from this case – were provided to Defendant well in advance of sentencing.

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1 Respectfully submitted this 17th day of January 2023.

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3 Vanessa R. Waldref
4 United States Attorney

5 s/ Richard R. Barker
6 Richard R. Barker
7 Patrick J. Cashman
8 Assistant United States Attorneys

9 **CERTIFICATE OF SERVICE**

10 I hereby certify that on January 17, 2023 I electronically filed the foregoing
11 with the Clerk of the Court using the CM/ECF System which will send notification of
12 such filing to counsel of record.

13 s/ Richard R. Barker
14 Richard R. Barker
15 Assistant United States Attorney
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